

Corrected Exhibit A

Proposed Order

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

In re:

LeClairRyan PLLC,
Debtor.¹

Case No. 19-34574-KRH
Chapter 7

**[PROPOSED] ORDER APPROVING FOURTH INTERIM APPLICATION OF QUINN
EMANUEL URQUHART & SULLIVAN, LLP AS SPECIAL COUNSEL TO THE
TRUSTEE, FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES INCURRED**

Upon consideration of the Fourth Interim Application (the “Application”)² of Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn”) as special counsel to Lynn L. Tavenner, not individually, but solely in her capacity as the Chapter 7 Trustee (in such capacity, the “Chapter 7 Trustee” and/or the “Trustee”) of the bankruptcy estate (the “Estate”) of LeClairRyan PLLC (“LeClairRyan” and/or the “Debtor”), in the above-referenced Chapter 7 case (the “Case”) for the period from March 1, 2022 through June 30, 2022 (the “Fourth Interim Period”); and the Court having reviewed the Application, and finding that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334, and determining that proper and adequate notice has been given and that no other or further notice is necessary; and after due deliberation thereon; and good and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is **APPROVED** in its entirety on an interim basis.

¹ The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

² Capitalized terms used but not defined in this Order shall have the meanings given to them in the Application.

2. Quinn is allowed interim compensation and reimbursement of expenses for the Fourth Interim Period in the amounts set forth in the Application.

3. Quinn is awarded, on an interim basis, Interim Administrative Fees in the amount of **\$66,595.50** and reimbursement of actual, reasonable, and necessary expenses incurred by Quinn during the Fourth Interim Period expenses in the amount of **\$62,222.58**.

4. Quinn is awarded, on an interim basis, Contingent Fees in the amount of **\$173,600.00**.

5. The total amount of Interim Administrative Fees and Fourth Interim Period expenses is **\$128,818.08**.

6. Nothing herein shall modify paragraph 8 of the *Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan LLP as Special Counsel* [ECF No. 937]. Notwithstanding anything in this order, nothing herein will prohibit Foley & Lardner (“Foley”) from later asserting that some portion of the fees related to this Fee Application or any other fees paid to Quinn during the pendency of this case should instead be payable to Foley. Moreover, nothing herein shall act as a bar for either the Trustee, Quinn or the Office of the United States Trustee to oppose any request by Foley for fees related to this Fee Application or any other fees paid to Foley during the pendency of this case. The payment of the amounts to Quinn set forth in this order shall not limit, preclude or impact in any way Foley’s right to seek recovery from Quinn and/or paid to Quinn during the pendency of this case. No rights are waived by Foley, Quinn, the Trustee, or the Office of the United States Trustee with respect to this Order and all parties’ rights are expressly reserved.

7. The Trustee is authorized and empowered to take such actions as may be necessary and appropriate to implement the terms of this Order.

8. Quinn is granted a limited waiver of Bankruptcy Rule 2002(a)(6) and Local Rule 2002-1 to serve a full copy of the Application as proposed therein.

9. This Court shall retain jurisdiction with respect to all matters relating to the interpretation or implementation of this Order.

10. This Order shall be effective immediately upon entry.

Dated: _____
Richmond, Virginia

United States Bankruptcy Judge

WE ASK FOR THIS:

QUINN EMANUAL URQUHART &
SULLIVAN, LLP

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Special Counsel to the Chapter 7 Trustee

LOCAL RULE 9022-1 CERTIFICATION

I, Erika L. Morabito, hereby certify that the foregoing proposed order was served upon all necessary parties.

Special Counsel to the Chapter 7 Trustee

Service List for Entered Order

Shannon F. Pecoraro, Esquire
Office of the United States Trustee
701 East Broad Street, Room 4304
Richmond, Virginia 23219

Paula S. Beran, Esquire
Tavenner & Beran, PLC
20 North Eighth Street, Second Floor
Richmond, VA 23219